

EXHIBIT D-1

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION**

This document relates to:

PBM Bellwether Cases

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaron Polster

**PLAINTIFFS' JURISDICTIONAL DISCOVERY REQUESTS FOR ANSWERS TO
INTERROGATORIES TO OPTUM DEFENDANTS**

COMES now the PBM Bellwether Plaintiffs and submit the following discovery requests pursuant to Rule 33 of the Federal Rules of Civil Procedure to Defendants UnitedHealth Group, Inc., Optum, Inc., OptumInsight, Inc., OptumInsight Life Sciences, Inc., OptumRx Discount Card Services, LLC, Optum Perks, LLC, OptumHealth Care Solutions, LLC, OptumHealth Holdings, LLC, and Optum Health Networks, Inc.

DEFINITIONS

This section sets forth specific definitions applicable to certain words and terms used herein. Unless words or terms have been given a specific definition in this section or in a specific request, each word or term shall be given its usual and customary dictionary definition, except where a word or term has a specific customary and usage definition in your trade and industry. In that case, the word or term shall be interpreted in accordance with the specific customary and usage definition.

1. “Inter-company” means communications, documents, strategies, or interactions shared between any parent, subsidiary, or sibling company of OptumRx, Inc., UnitedHealth Group, Inc. (“UHG”), Optum, Inc., OptumInsight, Inc., OptumInsight Life Sciences, Inc., OptumRx Discount Card Services, LLC, Optum Perks, LLC, OptumHealth Care Solutions, LLC, OptumHealth Holdings, LLC, and Optum Health Networks, Inc.

2. “Member data” means any personal, health, medical, health-related or other information or data about a member collected by or submitted to OptumRx, Inc., UnitedHealth Group, Inc. (“UHG”), Optum, Inc., OptumInsight, Inc., OptumInsight Life Sciences, Inc., OptumRx Discount Card Services, LLC, Optum Perks, LLC, OptumHealth Care Solutions, LLC, OptumHealth Holdings, LLC, or Optum Health Networks, Inc.

3. “Optum entity” means any parent, subsidiary, or sibling company of UnitedHealth Group, Inc. including but not limited to Optum, Inc., OptumInsight, Inc., OptumInsight Life Sciences, Inc., OptumRx Discount Card Services, LLC, Optum Perks, LLC, OptumHealth Care Solutions, LLC, OptumHealth Holdings, LLC, and Optum Health Networks, Inc and any other entity that is affiliated with the Optum entities and/or UHG that includes “OptumInsight” and/or “OptumHealth” as part of its name.

4. “You” or “Your” means the entities to which these Requests are directed and their officers, directors, employees, partners, representatives, agents, corporate parent, subsidiaries, affiliates, divisions, predecessors, or successors-in-interest, and other persons or entities acting on behalf of or controlled by them.

INTERROGATORIES

1. Identify all individuals who are employed by You and concurrently hold or have held another position at any of Your parent, subsidiary, or sibling companies.

2. Identify all Optum entities' offices, employees, physicians, medical directors, and/or case managers in the bellwether states during the relevant time period and describe any work that these offices/employees engaged in related to opioids.

3. Identify all inter-company work groups, committees, or task forces regarding or including the following:

- i. Inter-company strategies or coordination;
- ii. Opioids or treatment of pain;
- iii. Drug formularies;
- iv. Utilization management;
- v. Rebates and other fees or revenue from manufacturers;
- vi. Use of member data; or
- vii. Clinical studies of prescription drugs, drug marketing, or medical education.

4. Identify all members of the Optum Opioid Task Force¹, along with the titles of each member, their company affiliation, as well as the timeframe in which the individual served on the task force.

5. Identify all Optum entity offices, employees, physicians, medical directors, and/or case managers in the bellwether states during the relevant time period and describe any work that these office/employees engaged in related to opioids.

Dated: April 17, 2024

Respectfully Submitted,

¹ See, e.g., OPTUMRX_JEFFCO_0000014386-89 (discussing OptumRx, and other UHG and Optum entities as part of the broader UHG Enterprise initiative to reduce opioid misuse and abuse)

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